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Remarks

Reconsideration of the above-captioned application is respectfully requested. The Office Action continues to reject all pending claims as being obvious, continuing to use Lee et al. as the primary reference and this time proposing to combine Lee et al. with Bezos et al. (paragraph 3 of the Office Action), although in the detailed discussion of paragraph 4 the now-disqualified Mullen-Schultz reference is mentioned. To the extent that the rejections in fact rely on Mullen-Schultz as mentioned in paragraph 4, the rejections must be withdrawn, since Mullen-Schultz was disqualified as prior art in Applicant's last response.

Additionally, the Examiner continues to allege that Lee et al. teaches accessing a table of inlinks to facilitate generating a list of sibling links based on the table, with each sibling link being an outlink of one of the inlinks in the table, as set forth in Claim 1. Applicant once again points out that this is factually incorrect. Lee et al. is not directed to searching the Web, but rather to using hyperlinks which are correlated with information on a single Web site to allow a user to look at a list of the hyperlinks, shown with their associated topics, so that a user can click on a link associated with a topic of interest. Sub-links that are associated with sub-topics can also be viewed.

The relied-upon section of Lee et al. that has been used as a teaching of inlinks to facilitate generating a list of sibling links, with each sibling link being an outlink of one of the inlinks in the table (col. 14) simply discusses a hierarchy of links. There is no teaching or suggestion that the links are inlinks, much less that they are used in turn to generate a list of outlinks. In fact, Lee et al. does not generate a list or table of any links based on other links, much less the specific links set forth in Claims 1 and 7. Thus, Lee et al. does not teach using links, much less inlinks, to generate a list of outlinks of the inlinks, as is otherwise recited

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in Claims 1 and 7. Further, since all links in Lee et al. are related to topics, either they are all inlinks, or they are all outlinks, but they cannot be both.

The allegation that Bezos et al. "is in the same field of endeavor" (presumably, as Lee et al.) that underpins the suggestion to combine is incorrect. Bezos et al. is directed to allowing associate Web sites of Amazon to advertise Amazon products and receive credit when a user clicks on a product hyperlink to take him back to Amazon to buy the product. It has nothing to do with Lee et al., which is directed to allowing a user surf a single Web site for information without any transactions evidently being contemplated. Accordingly, the suggestion to combine references, being based on an incorrect premise, renders the *prima facie* case invalid.

Moreover, even if Bezos et al. were to be combined with Lee et al., the present claims would not be obtained. Specifically, adding Bezos et al. to Lee et al. would simply result in adding another set of unrelated links - to associate sites - to Lee et al., without resulting in the generation of anything, much less in the generation of outlinks to the inlinks.

The unique limitations of independent Claims 13 and 15 have yet to be addressed in prosecution. Indeed, they, like Claims 1 and 7, are patentable over the relied-upon references.

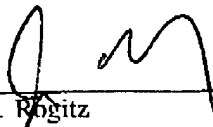
The Examiner is cordially invited to telephone the undersigned at (619) 338-8075 for any reason which would advance the instant application to allowance.

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Respectfully submitted,



John L. Rogitz
Registration No. 33,549
Attorney of Record
750 B Street, Suite 3120
San Diego, CA 92101
Telephone: (619) 338-8075

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